

1 WILLIAM PATE (SB # 45734)
William.pate@nlrb.gov
2 STEPHANIE CAHN (SB # 189277)
Stephanie.cahn@nlrb.gov
3 MATHEW SOLLETT (SB # 285416)
Mathew.sollett@nlrb.gov
4 National Labor Relations Board, Region 21
312 North Spring Street, 10th Floor
5 Los Angeles, California 90012
Telephone: (213) 634-6522
6 Facsimile: (213) 894-2778
Attorneys for Petitioner
7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 WILLIAM B. COWEN, Regional
Director of Region 21 of the National
12 Labor Relations Board, for, and on
behalf of, the NATIONAL LABOR
13 RELATIONS BOARD,

14 Petitioner,

15 v.

16 PACIFIC GREEN TRUCKING, INC.

17 Respondent.
18

Civil No. 2:19-CV-00663 AB (RAOx)

APPLICATION FOR DEFAULT
JUDGEMENT

19 Pursuant to F.R.C.P. 55 and Local Rule 7-12, Petitioner William B. Cowen,
20 through counsel, applies to this Court for a default judgement against Respondent
21 Pacific Green Trucking and for an order granting Petitioner's Petition for
22 Preliminary Injunction under Section 10(j) of the National Labor Relations Act
23 (herein called the Act), 29 U.S.C. Section 160(j). In support thereof, Petitioner
24 states as follows:

25 1. On January 29, 2019, Petitioner filed with this Court a Petition for
26 Preliminary Injunctive Relief under Section 10(j) of the Act [29 U.S.C. Section 160
27 (j)];

28 2. On February 13, 2019, Administrative Law Judge Jeffrey Wedekind

1 issued an Administrative Decision and Recommended Order in which he found that
2 Respondent committed the same unfair labor practices Petitioner seeks to enjoin in
3 this proceeding. On February 15, 2019, Petitioner requested that this Court take
4 judicial notice of the Administrative Decision and Recommended Order;

5 3. As evidenced by declarations of service filed with this Court,
6 Petitioner has timely served all documents related to this proceeding on
7 Respondent;

8 4. Respondent has failed to file a notice of appearance or any responsive
9 documents with this Court related to this proceeding;

10 5. There has been no evidence presented to support any other conclusion
11 than Respondent willfully and maliciously failed to respond to Petitioner's Petition
12 for Preliminary Injunctive Relief, thereby ignoring an agency of the United States
13 Government and an Honorable Court which is charged with enforcing its laws.

14
15 **WHEREFORE**, Petitioner prays that the Court enter, as final, its [Proposed]
16 Findings of Fact and Conclusions of Law and [Proposed] Order Granting
17 Temporary Injunction Under Section 10(j) of the Act, filed with this Court on
18 February 12, 2019 and February 13, 2019, respectively.

19 Dated at Los Angeles, California, this 21st day of March, 2019.
20

21
22 /s/ Mathew Sollett
23 Mathew Sollett
24 Counsel for Petitioner
25 National Labor Relations Board,
26 Region 21
27 312 North Spring Street, 10th Floor
28 Los Angeles, CA 90012
Telephone: (213) 634-6522
Fax: (213) 854-2778
Email: mathew.sollett@nrlrb.gov